

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

---

**JOSHUA BARNETT,**

**Civil Action No.:**

**Plaintiff,**

**Judge  
Magistrate Judge**

**v.**

**EQUIFAX INFORMATION  
SERVICES LLC AND US BANK,  
N.A.,**

**Defendants.**

---

**NITZKIN & ASSOCIATES**  
Gary D. Nitzkin  
Travis Shackelford  
22142 West Nine Mile Road  
Southfield, MI 48033  
(248) 353-2882  
Email: gnitzkin@creditor-law.com  
*Attorneys for Plaintiffs*

---

**CLARK HILL PLC**  
Jordan S. Bolton (P66309)  
500 Woodward Avenue, Ste. 3500  
Detroit, MI 48226-3435  
(313) 965-8300  
Email: JBolton@clarkhill.com  
*Attorneys for Equifax Information  
Services LLC.*

---

**NOTICE OF REMOVAL**

Defendant, Equifax Information Services LLC (“Equifax”), by Counsel, and hereby file this Notice of Removal of this action from the 15<sup>th</sup> District Court, Michigan wherein it is now pending as Case No. CIV141695, to the United States District Court for the Eastern District of Michigan. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441 and 1446. In support hereof, Defendants show this Court as follows:

1. An action was filed on October 7, 2014 in the 15<sup>th</sup> District Court, Michigan, entitled *Barnett v. Equifax Information Services LLC, et al.*, Case No. CIV141695 (the “State Court Action”).

2. Equifax was served with the Complaint on October 17, 2014.

3. This Notice is being filed with this Court within thirty (30) days after Equifax was served with a copy of Plaintiff’s initial pleading setting forth the grounds for his action and his claims for relief.

4. This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or treaties of the United States; specifically 15 U.S.C. § 1681 *et seq.*, otherwise known as the Fair Credit Reporting Act (“FCRA”), as follows:

(a) Plaintiff’s Complaint, on its face, alleges a violation of the FCRA. (See Plaintiff’s Complaint).

(b) The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action alleging a violation of its provisions “may be brought in any appropriate United States district court without regard to the amount in controversy . . .”

5. Promptly after the filing of this Notice of Removal, Equifax shall give written notice of the removal to Plaintiff and to the Clerk of the 15<sup>th</sup> District Court, Michigan, as required by 28 U.S.C. § 1446(d).

6. Attached hereto, as Exhibit A, are copies of the Summons and Complaint served upon Equifax in the State Court Action.

WHEREFORE, Equifax requests that the above-described action be removed to this Court.

Respectfully submitted this 10<sup>th</sup> day of November, 2014.

/s/Jordan S. Bolton

Jordan S. Bolton (P66309)

CLARK HILL, PLC

500 Woodward Avenue, Suite 3500

Detroit, MI 48226

Tel. (313) 965-8300

Fax (313) 965-8252

[jbolton@clarkhill.com](mailto:jbolton@clarkhill.com)

*Attorneys for Equifax Information Services  
LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10<sup>th</sup> day November, 2014, I electronically filed the foregoing **NOTICE OF REMOVAL** with the Clerk of Court using the CM/ECF system, and have sent a copy via U.S. Mail to the following:

Gary D. Nitzkin  
Travis Shackelford  
Nitzkin & Assoc.  
22142 W. Nine Mile Rd.  
Southfield, MI 48034  
*Attorneys for Plaintiffs*

/s/Jordan S. Bolton  
Jordan S. Bolton